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10 Attorneys for Defendant American
11 Express National Bank

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

10 JELMER HOEKSTRA,
11 Plaintiff,
12 vs.
13 CREDIT ONE BANK, N.A.; CAPITAL
14 ONE SERVICES, LLC; and
15 AMERICAN EXPRESS NATIONAL
16 BANK,
Defendants.

Case No. 2:21-cv-02082-GMN-VCF

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO RESPOND
(FIRST REQUEST)**

17 Plaintiff Jelmer Hoekstra and defendant American Express National
18 Bank (“Amex”) stipulate that the deadline for Amex to respond to the complaint
19 (ECF No. 1) be extended from December 27, 2021 until January 24, 2022. This is
20 the first extension sought in connection with this deadline.

1 This extension is requested to permit the recently hired counsel for
2 Amex sufficient time to investigate the allegations in the complaint and to discuss
3 the prospects for early resolution with Mr. Hoekstra.

4 FREEDOM LAW FIRM

5 _____
6 /s/ Gerardo Avalos

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9 8985 South Eastern Avenue
10 Suite 350
11 Las Vegas, Nevada 89123

12 KIND LAW
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17 Attorneys for Plaintiff Jelmer Hoekstra

18 KAEMPFER CROWELL

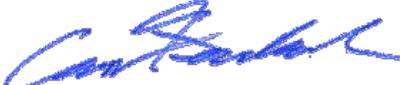
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28 **ORDER**

29 IT IS SO ORDERED.

30 

31 _____
32 = UNITED STATES MAGISTRATE JUDGE

33 _____
34 DATED: 12-20-2021